BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Mail Processing Network
Rationalization Service Changes, 2012   Docket No. N2012-1

PUBLIC REPRESENTATIVE'S FIRST SET
OF INTERROGATORIES AND REQUESTS FOR PRODUCTION TO
UNITED STATES POSTAL SERVICE WITNESS ROSENBERG (PR/USPS-T-3: 1-16)

(December 21, 2011)

Pursuant to 39 CFR 3001.25 through 3001.28, the Public Representative hereby submits the following interrogatories and requests for production of documents. Due to availability of the Public Representative and staff to review Postal Service answers over the holiday weeks, the Public Representative proposes that the witness provide answers no later than January 12, 2012, rather than the customary 14 days. Definitions and instructions included with the Public Representative's First Set of Interrogatories and Requests for Production to United States Postal Service, PR/USPS-1-3 dated December 21, 2011, are hereby incorporated by reference.

 The Public Representative encourages the Postal Service to discuss issues of burden, privilege, relevance, or question clarity informally to obviate the need for objections or motions practice.

                                        Respectfully Submitted,

                                        /s/ Christopher J. Laver

                                        Public Representative for
                                        Docket No. N2012-1

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PR/USPS-T-3-1

Please refer to USPS-LR-14, 14_Mail Processing Window Scoring Tool.xls, Worksheet: "Assumptions."

      a. Please confirm that the current total number AFCS machines in use is 1,026. If not confirmed, please explain.
      b. Please list the maximum throughput per hour of each machine in Cells C48:C76, assuming the machine is idle 3 minutes (5 percent) each hour.
      c. What is the current utilization rate of each of the machines listed in "b", by tour?
      d. What do you expect the utilization rate of each of the machines listed in "a", by tour, if the Postal Service's proposal is implemented?

PR/USPS-T-3-2

Please refer to USPS-LR-17, 17_ZipAssignment_LocalInsight.xls, Worksheet: "Summary," Cell BA2.

      a. Please confirm that cell BA6 indicates there are two AFCS machines for the facility identified as Finance Number 480015.
      b. If confirmed, please also show, linking all necessary worksheet names and cells, how the number of two AFCS machines is derived.

PR/USPS-T-3-3

Please refer to USPS-LR-17, 17_ZipAssignment_LocalInsight.xls, Worksheet: "Summary," Cells BA2:BH4.

      a. Please confirm that the number of each of these machines listed above is mapped to the assumed number of machines in USPS-LR-14, 14_Mail Processing Window Scoring Tool.xls, Worksheet: "Assumptions," Cells D47:D76.
      b. Please show, linking all necessary worksheet names and cells, how each of these values was calculated.

PR/USPS-T-3-4

Please refer to both USPS-LR-14, 14_Mail Processing Window Scoring Tool.xls, Worksheet: "Assumptions," and USPS-LR-17, 17_ZipAssignment_LocalInsight.xls, Worksheet: Model MODS, Cells AM29:AM944. Please provide a list of the number of each of type of machine in cells C47:C76 of 14_Mail Processing Window Scoring Tool.xls, Worksheet: "Assumptions," by the 3-digit ZIP Codes generated in USPS-LR-17, 17_ZipAssignment_LocalInsight.xls, Worksheet: Model MODS, Cells AM29:AM944.

PR/USPS-T-3-5

Please refer to both USPS-LR-14, 14_Mail Processing Window Scoring Tool.xls, Worksheet: "Assumptions," and USPS-LR-17, 17_ZipAssignment_LocalInsight.xls, Worksheet: Model MODS, Cells AM29:AM944. Please provide a list of the number of each of type of machine in cells C47:C76 of 14_Mail Processing Window Scoring Tool.xls, Worksheet: "Assumptions," by the 3-digit ZIP Codes generated in USPS-LR-17, 17_ZipAssignment_LocalInsight.xls, Worksheet: Model MODS, Cells AM29:AM944.

PR/USPS-T-3-6

Please refer to page 14, footnote 15 of your testimony, where you state that "additional consolidation has occurred as part of the June 2008 Network Plan…"

      a. How would the outputs derived from the Mail Processing Scoring Tool based on the June 2008 network plan compare with those that were used as inputs into Network Optimization performed in USPS-LR-15, Logical Networks?

      b. How many nodes would the Network Optimization tool generate based on the June 2008 network plan?

PR/USPS-T-3-7

Please refer to page 17 of your testimony, where you state, "The Logic Net optimization model activated 177 processing facilities…Sixty one buildings activated by the model were later deactivated; 71 sites were activated based on site specific capacity analysis and discussion with the Area." Please confirm that, based on this statement, 71 of the 187 sites used, or 38 percent, were not considered optimal by the model? If not confirmed, please explain.

PR/USPS-T-3-8

Please refer to page 23 of your testimony where you state "[f]or a site to earn its first AFSM100... it must be at least 25 percent utilized." Please provide the basis for the 25 percent utilization threshold, including any supporting data or workpapers.

PR/USPS-T-3-9

Please reconcile or explain Figure 3 on page 35 of your testimony with the information presented on operating windows shown in USPS- LR-13 Wkld Volume by OP.xls, Sheet: "Time." Both appear to show the operating windows for letters and flats.

      a. For example, the Library Reference appears to show that the Outgoing Primary window for Letters sorted on the DBCS is 9 hours (from 0:00 to 9:08) on day 0, 12 hours (from 21:09 to 33:08) on day 1, and 12 hours (from 45:9 to 57:08) on day 2. However, Figure 3 appears to limit the Outgoing Primary window from 17:30 to 12:30, 4 hours.

      b. Please reconcile any similar discrepancies between the time windows shown in Figure 3 and USPS- LR-13 Wkld Volume by OP.xls, Sheet: "Time."

PR/USPS-T-3-10

Please define the term "geography factor" term used in USPS-LR-14, Scoring Tool, 14_Mail Processing Window Scoring Tool.xls, Sheet "Assumptions," Cell E24.

PR/USPS-T-3-11

Please refer to page 6 of your testimony where you state: "Then the model 'scores' each scenario based upon hypothetical transportation, labor, overhead, and administrative costs. These hypothetical costs are used for scoring purposes only, to compare the different scenarios and should not be misinterpreted as cost savings estimates associated with any particular network scenario. " Please confirm that the choice of different hypothetical costs would not change the results of the comparison between different scenarios? If not confirmed, please explain.

PR/USPS-T-3-12

Please refer to page 6, footnote 4 of your testimony where it states, "Together, the 48 contiguous states and the District of Columbia have an area of 3,119,884.69 square miles. Of this, 2,959,064.44 square miles are land, comprising 83.65 percent of U.S. land area.

Officially, 160,820.25 square miles are water, comprising 62.66 percent of the nation's water area."

    a. Please provide a primary source for these figures.

    b. Please discuss whether you considered distributing the workload over an alternate measure of area, such as inhabited land mass, rather than total land mass. Please explain why you rejected other methods of distributing the workload over area.

PR/USPS-T-3-13

Please refer to page 7, footnote 6 of your testimony where you state: "The Fiscal Year 2010 Transportation Contract Support System (TCSS) recorded 19,636 Post Office collection to cancellation processing site trips and 18,022 destination processing plant to delivery unit trips, while the Enterprise Data Warehouse reported a total of 27,559 Post Offices." Please also refer to Library Reference USPS-LR-N2012-1/35, which you reference.

    a. Please confirm that the table 'TCSS' in MS Access file '35_TCSS' represents data from the TCSS database. If confirmed, please provide the description of all Fields (n_dn, n_conid, n_seg, etc) that exist in the Table 'TCSS'.

    b. Please define the name of the table 'All Dry Lanes' and provide a description of all Fields that exist in this table. Please also provide the source of the data presented in the table 'All Dry Lanes'.

    c. Please confirm that USPS-LR-N2012-1/35 provides records from the Enterprise Data Warehouse? If confirmed, please indicate the names of the tables where the records are provided. If not confirmed, please explain.

    d. In the SQL query 'qryCollaborative", which matches two tables ('All Dry Lanes' and 'TCSS'), you perform a joint operation using the Zip Code Field (or Postal Code Field) in 'All Dry Lanes' table and the Nass Code Field in the TCSS table. Please explain why the tables are matched using these fields. Do the fields ('Zip Code' and 'Nass Code' have the same meaning?

    e. Please describe and explain the result of the query 'qryCollaborative' that merges tables 'All Dry Lanes' and 'TCSS', and explain how the data from the query table 'qryCollaborative' are used in the modeling or analysis.

PR/USPS-T-3-14

Please refer to page 9 of your testimony where it states: "A minimum threshold of 21,265 square feet, determined on the basis of regression analysis was set for each mail processing site".

    a. Please provide a library reference with the regression analysis and results in SAS or other statistical software.

b. Please confirm that USPS-LR-N2012-1/36 does not contain data on building square feet used for regression analysis.

c. Please provide all data used for the regression analysis. If this data exists in an existing library reference, please indicate the specific worksheet(s) where the data are present.

PR/USPS-T-3-15

Please refer to page 9 of your testimony where it states: "Overhead costs include the following categories from the Fiscal Year 2010 Postal Service Financial Reporting (PSFR): administrative, supplies, supplies (inventory), rent, and depreciation."… "The PSFR data are provided in USPS Library Reference N2012-1/36".

a. Please confirm that table 'ACCTG' in USPS-LR-N2012-1/36 provides data on overhead costs for the Fiscal Year 2010 (Field 'FY 2010_Amt').

b. Please reconcile or provide a cross-walk for the sub-categories of overhead costs in Field 'Line Description' of Table 'Line' in USPS-LR-N2012-1/36, with the aggregated categories listed on page 9 of the testimony.

PR/USPS-T-3-16

Please refer to page 14, footnote 17 of your testimony where it states: "The opportunity cost was calculated using regression analysis to determine the sale price of owned buildings". .."Details are provided in library reference USPS-LR-N2012-1/15". Please provide a library reference with the regression analysis and results in SAS or other statistical software.